

Response to the Local Plan Issues consultation

Question 1: Do you have any comments on the content of the new Local Plan and its relationship with other plans?

1. Transport DCC transport strategy:

a. Travel to work area: The transport strategy states:

“The Exeter Travel to Work Area (TTWA) has grown considerably in recent years and is now the second largest geographical TTWA in the country (behind Cambridge). The growth in Exeter jobs has been filled by labour from outside the city leading to rising levels of inward commuting, 48% in the last Census”

The plan should focus on cooperation with other districts in order to reduce the volume and distance of the travel to work area.

The plan should focus on significant improvement of the infrastructure, reliability and affordability of public transport and the infrastructure to allow public transport and shared mobility into the city from outside.

We continue to object to park and ride sites in Exeter as this is an inefficient use of land, and has a negative effect on biodiversity where they are built on greenfield sites. Park and Ride also has negligible impact on carbon emissions as it only replaces car use for a very small part of the overall journey.

The local plan must absolutely prioritise the sustainable travel hierarchy and that should be updated to include shared transport options above those of a private car. There must be absolute recognition of the *Clear Streets Charter* in order to particularly assist those who have a disability. This Charter should be reviewed and updated as required and incorporated into planning policy. This is particularly important for the siting of EV charging points - whether shared or private. This should not clutter that pavement, should be placed in the road wherever possible in order to keep pavements clear and also act as traffic calming. Cables must not clutter pavements.

Achieving the stated goal of 50% of trips to be walking and cycling will require a radical overhaul of the existing transport network in Exeter away from prioritising the private car. This must be undertaken, and can be achieved, through the planning process. This must prioritise making walking and cycling safe, a reduction in speeds and significant improvements to air quality to meet WHO standards.

Transport innovations must aim to reduce congestion, improve air quality and road safety and where necessary generate income in order to finance public transport measures.

An absolute priority must be to ensure that measures enable access and equal participation for people with disabilities.

2. Resource and waste management strategy for Devon

<https://www.devon.gov.uk/wasteandrecycling/document/resource-and-waste-management-strategy-for-devon-and-torbay>

Planning Policy priority should enable the prevention, reduction, reuse and recycling of waste before incineration and landfill as set out in the policy. Planning policies should pay particular attention to the following:

“The contracts for the ERFs are 30 years from 2014 (Exeter) and 25 years from 2015 (Plymouth) respectively. Hence for the period of this strategy these contracts will continue. Given the lead in time for large waste management facilities, towards the end of the strategy period consideration will need to be given as to what to do with the residual waste from 2040. Technologies will have moved on by then and there will be less residual waste to deal with so these factors will influence future choices.”

Therefore during the life of this new Plan decisions will have to be made about the renewal, replacement or alternative to the incinerator on Marsh Barton. The district heating that was proposed for Marsh Barton when the incinerator was granted permission has not materialised nor has the proposed district heating to Southwest Exeter been built out. Therefore, a new approach is required to both the role of incineration as a treatment of waste (noting that landfill does have a higher level of carbon emissions than incineration, and a goal to create a circular economy), and the requirement to provide district heating from the plant. The incinerator in Exeter is a significant, if not the largest, [emitter of CO2 in the city](#). Therefore alternative methods of disposal of waste should be prioritised and no new incinerators granted permission in Exeter.

Any district heating system should focus on the heating of water rather than the space heating of homes, since a net zero carbon approach to developments and new homes should mean that the fabric first and onsite renewables approach will not require any offsite heating inputs. Any district heating that is connected to the current incinerator should be able to be retrofitted to air source or ground source heat pumps instead so that incineration doesn't become locked in.

In light of the foregoing the desirability (in planning terms) and viability of South West Exeter District Heat Network, the *Energy Centre Design and Exeter Energy Network Detailed Feasibility Study* should be reviewed. This would also affect the contributions made by developers.

3. Riverside & Ludwell Valley Parks Masterplan

This document is supplementary planning guidance. This should be updated and strengthened especially in light of the growing pressures on this area and key principles incorporated into the new LP. No green spaces identified in the plan should be built on or redefined as 'brownfield'.

4. Devon Nature Recovery Strategy

This should be formally recognised and incorporated in the local plan. [Nature Recovery - Devon Local Nature Partnership \(devonlnp.org.uk.\)](#) - see comments below.

Question 2: Are these the main issues facing Exeter? Are there any issues which we should change, add or remove?

a. Climate Change:

The statement about climate in the local plan issues document is wholly inadequate.

Exeter has declared both a climate emergency AND an ecological emergency - interconnected crises. *These issues impact most on the poorest in our communities here in Exeter.* Planning is one of the city's key mechanisms for managing and reducing embodied carbon and future carbon production. Tackling climate change must therefore be recognised as the main operating context and challenge that frames the local plan, not simply 'another issue' to address.

The following issues need to be considered:

- As a *bare minimum* the new Local Plan must demonstrably meet the requirements of the Climate Change Act, subsequent UK carbon budgets and any outcomes arising from the COP26.
- The City has adopted 2030 for a net zero target. This must be considered an enabling policy. New developments or significant change in localities should be net zero from the start and not have to be retrofitted. The aim should be carbon reduction.
- It should be noted that The Net Zero Exeter 2030 Plan *has not been proven to be a robust evidence-based plan* - there is no evidence to demonstrate that if the actions are undertaken that it will result in net zero by 2030 - the actions set out a direction of travel. An assessment of local carbon reduction potential must also take into account regional, national and international targets.
- The issues document says policies and proposals should "contribute to meeting this challenging ambition", the new plans and policies must "ensure" that the ambition is met, this should be underpinned by demonstrable and credible evidence. The Planning and Compulsory Purchase Act of 2004 requires that local plans include policies "designed to secure" that the development and use of land contributes to the mitigation of, and adaptation to, climate change.
- The new Local plan's *cumulative climate impacts* must be assessed and taken into account as set out in the The Environmental Assessment of Plans and Programmes Regulations 2004 –

which implements the Strategic Environmental Assessment (SEA) Directive. This includes assessing the consistency of proposed policies with all relevant climate objectives and targets.

- Moreover the new plan must include measures to both mitigate against the effects of climate change and provide opportunities to adapt to climate change - and these must be done in ways that *achieve the sustainable development goals and tackle inequality and the ecological emergency* (as set out in the climate emergency declaration).
- To “make the most of the *opportunities* of a net zero carbon city” must be done in a way which has a positive ecological and social impact on the city - i.e. improving and protecting existing biodiversity, creating opportunities for new biodiversity/restoration and reduction of poverty and inequalities in the city, enable real community ownership.
- Net Zero approach must include substantial policies and plans to reduce GHG emissions, not just rely on emissions offsetting. Any ‘offsetting’ should be undertaken locally and provide a calculated evidence base. All design codes must be able to demonstrate net zero.

b. Ecology

- The work of the Devon Nature Recovery Strategy should be formally recognised and incorporated in the local plan. [Nature Recovery - Devon Local Nature Partnership \(devonlnp.org.uk\)](https://devonlnp.org.uk)
- New developments/regeneration should contribute to an Exeter ‘Biodiversity Improvement Plan’, to lead to real biodiversity gains, (if the LNP above does not cover this), ensuring that any plans or developments avoid environmental impacts, minimise any environmental harm, and furthermore require that development actually restore and enhance nature. Such a plan should include (if not covered by the Devon Local Nature Partnership) high quality, accurate and up to date environmental information and sufficiently resourced information infrastructure. This should be led by expert bodies, able to provide accurate and timely environmental data and be adopted as planning evidence/into the Plan. Such a plan should include meaningful community involvement e.g. community mapping, alongside expert input.
- Development should be prohibited on irreplaceable habitats. Sites of Special Scientific Interest (SSSI), local conservation areas/wildlife sites should be given enhanced protection, including from the impact of air pollution. ‘Highly Protected Areas’ where development is strictly prohibited should be established.
- The new local plan should provide strict protection for the remaining fragments of priority habitat across the city through protected designated nature conservation areas and the development of a protected Ridgeline Park. The plan should facilitate the increased connection between the conservation areas and local areas of green space to create a network of green/nature spaces especially in areas of deprivation and high density. This network can also be useful for active travel corridors.
- A strategic approach should be taken for the land left over after planning at a neighbourhood level - bringing in small habitat pockets outside of designated green spaces into community/common ownership at a strategic level to enable them to connect up with designated areas and be managed in a more consistent way.

- Biodiversity/nature must be integrated in all developments and places through sustainable design and green infrastructure. The plan must set out enabling policies, such as SUDS, as well as restrictive policies such as preventing paving of gardens and limiting plastic grass. A minimum biodiversity expectation for gardens should be set out. A policy for the installation of EVS shouldn't enable gardens to be paved. The paving of any gardens/removal of hedgerows must require planning permission and a contribution through S106 to alternative sustainable urban drainage.
- Ring-fenced developer contributions for local nature recovery must be included as a matter of course - not just for SANGS protected sites, but for sites within the city AND the local neighbourhood to reduce impact on the SANGS sites.
- The Accessible Natural Greenspace Standard for England (Natural England, 2010a) should be formally recognised as a minimum standard in terms of access to green spaces.

c. Social and Community:

- The priority should be to create and enhance a *network of local neighbourhoods with strong local identity and economic opportunities* - rather than forcing people into the city centre or to out of town retail sites or to access community facilities - to reduce the need to travel and create more sustainable neighbourhoods.
- Planning needs to address inequality, including improving local environments to promote health and wellbeing in localities. There should be a reduction in the need to commute, and improvements to active travel and public transport should include all journeys and moving around the city, not just commuting.
- Health and wellbeing needs to be systematically integrated e.g. active travel and designing out crime etc.
- Hospital capacity and GP infrastructure needs to be provided and local schools for local communities. New schools will be needed in the Livable Exeter areas alongside access to tertiary education, adult education and opportunities to integrate.
- Schools should be designed around walkable distances and safe routes for year 6 children to walk/cycle to school safely off road alone.
- Each neighbourhood should have access to a range of community facilities and provide opportunities for community ownership of these assets.
- Heritage: Exeter's heritage settings and individual sites need active protection in the new Plan. New developments have to be sympathetic (not a pastiche), and respect both significant and local heritage. Conservation areas need to be updated, particularly in light of new national conservation guidance, this is a good opportunity to involve communities in this process. Landscape and nature as well as the built environment should be incorporated into the conservation areas.
- We note there is a deficit in NHS primary and secondary care infrastructure and the funding for this. Primary care infrastructure needs investment in local community centres alongside local cultural, community and natural resources.

d. Homes:

- Are the housing numbers correct? We note the issues raised by the Office for Statistics Regulation in relation to the Population projections and mid-year population estimates for Coventry which have been cited as a potential cause for concern in other similar size cities with large student populations. A review of the population projections and associated household projections and housing is required.
- We are concerned that previous policies to deliver affordable housing have failed, with increasing rent and purchase prices and an increasing homeless and rough sleeping problem in Exeter. A robust approach must be taken to ensure the proportions and deliverability of affordable housing meet current and projected need. Community led solutions such as community land trust and self build must be enabled as part of this solution and provided for in the Plan.
- Clarity should be provided about build-to-rent. There is no policy currently, which provides uncertainty for developers and no reasonable basis for the authority to basis planning decisions. As a minimum, build to rent MUST contribute CIL, be required to provide long-term living that meets minimum space standards in addition to any shared spaces/ facilities and a share of affordable housing to meet the authorities full policy. Such shared facilities should be conditioned so as to be free to use in perpetuity and maintained. If such build to rent facilities don't meet these requirements then such developments should be considered as houses in multiple occupation. In light of the significant housing need in Exeter, such build-to-rent accommodation must meet the local requirement for affordable housing - a minimum of 35%.
- 'Tiny homes' should only be allowed by exception e.g. For self build or to interim housing for people who are moving on for homelessness, where there is an identified need for this.
- The First Home Policy should be reviewed, with a view to increasing the portion of affordable housing overall. Community led homes should be supported in planning policy to build on land provided by the council or developers through asset transfer of land should to provide affordable housing in perpetuity.
- The proportion of affordable housing should be reviewed but not be reduced below the current proportion of 35%, which is not already not meeting needs . Because of acute housing need and affordability homes built on brownfield sites and build-to-rent should be more than 20% proportionally.
- Schemes that do not provide the threshold level of affordable housing or meet other relevant policy criteria, or that provide off-site or cash in lieu contributions, must follow the Viability Tested Route and be subject to viability scrutiny (paid for by the applicant) and a programme of late, as well as early, review mechanisms should be built into S106 agreements.
- Large-Scale Purpose-Built Shared Living (currently called "Co-Living") should require that all schemes provide a financial contribution such as that is equivalent to 35 percent of the units, to provide social housing.
- The purchase of second homes should be prevented and airBnB etc.should be regulated, through the planning system in conjunction with other mechanisms in the Council, and conditioned in new developments.

- A tighter definition on affordable housing should be set out and affordable housing be mixed in with private (pepper pot) so as to be indistinguishable - exactly same external appearance, quality of build, renewables etc and remain affordable in perpetuity.
- More use of CPO and other mechanisms to bring empty homes back into use should be set out.
- The Plan should adopt a Whole life carbon assessment to achieve net zero carbon in the construction, operation and demolition of buildings and infrastructure see: [Net Zero Whole Life Carbon Roadmap for the Built Environment - UKGBC - UK Green Building Council](#)
- A 'Hierarchy of development', should be followed: 1. refurbishment, avoiding demolition to protect embodied carbon; 2. development on brownfield sites (subject to comments elsewhere); 3. infill sites and the avoidance of building on green spaces.
- Any major development should be accompanied by an energy consumption report and a new system of carbon accounting to show how either the zero carbon standard is calculated or in exceptional cases a tariff for carbon, similar to that currently working for non residential buildings in various London Boroughs.
- Quality of design: must include, as well as being net zero (with appropriate renewable technologies to generate onsite energy as the first priority) sustainable urban drainage - managed onsite where possible and good quality, sustainable and durable materials.

e. **Economy**

- The priority should be for planning policy to prioritise local business, a strong resilient local economy that promotes a low carbon, circular economy.

f. **Transport:**

- Developments should be permeable by foot through to other adjoining areas.
- The promotion of EVS should include the promotion of electric bicycles as an EV, with on-street bike bunkers with bike charging points, dedicated bike lanes and EV chargers for cars built out onto roads and incorporated into traffic calming alongside segregated cycle paths - not cluttering pavements.
- More cycle parking should be incorporated into the Plan and these locations should be advertised.
- Expand electric car and bicycle clubs into all residential areas, with spaces allocated or required through the planning system, reducing the need for car ownership and offering access to a car or bike for those who are unable, or choose not to, own one; and secure a major increase in electric car charging facilities for those who need them.
- Parking spaces should be provided for people with disabilities, shared cars and visitors and minimal on street car parking. Allocated parking in new developments should be grouped together to make better use of land. The design code should set out residential street layouts to reduce space and speed available for cars, including parking spaces, and exchange this space with 'pocket parks', safe play areas for children, more tree-planting and on-street bike 'bunkers' offering covered bicycle storage. Exciting streets should be retrofitted to meet this design code.
- Low carbon travel and reduction in air pollution and congestion cannot be achieved unless there is a radical change to our transport system. This must include viable, frequent and

affordable alternatives for people travelling in from outside the city or across the city. The plan must actively reduce the travel to work area for Exeter - work with neighbouring districts.

- Work with Devon County and other District Councils to introduce 'Link and Ride' schemes as an alternative to further Park and Ride, providing high quality buses along strategic routes into Exeter, with smaller car parks along the route, ensuring a greater proportion of journeys can be made by public transport. This would be funded by CIL and a Workplace Parking Levy – a tax on the parking spaces of the city's largest businesses and employers, as has successfully been implemented in Nottingham.
- The plan should reduce the number of car parks in central Exeter, as the land is better used for affordable homes or green spaces and use 'intelligent pricing' at the remainder to maximise income for investment in sustainable transport and other council services.
- The planning system should introduce area wide [Low Traffic Neighbourhoods](#), planned and designed to restrict through movements of traffic (rat-running), reduce traffic speeds, and make walking and cycling safer, easier and more pleasant. These should be joined to develop comprehensive and joined up traffic-free cycling and walking routes across the city.

Question 3: Do you have any comments to make on this vision for the new Local Plan?

"Growth": this is not defined, and should be. Exeter obviously has a limited land area and the challenges the city faces currently show that it is nearing or at the limits of growth within its current physical and ecological boundaries. The impact on continued growth in terms of its social impact e.g. unaffordability of house prices and renting is not acknowledged.

The focus should be instead on the development of a sustainable city, that is strengthened by a circular economy designed to meet the needs, including housing, of residents.

"Connected city region": This is unclear jargon. There needs to be a recognition of Exeter's role as a city in a rural county and strengthening those relationships with that setting, first and foremost. This will create a more resilient city for the future.

"consisting of thriving linked communities": Exeter already has some distinct communities, which have an identity connected to a sense of place. Other areas, especially some of the new communities do not. The new local plan must recognize and enhance an area's existing heritage, cultural, natural and built environment and in new developments create a sense of purpose and place so that new residents can feel they belong to a neighbourhood and its community. Thriving communities also require a focal point and purpose - not just being a dormitory place.

"Exceptional environmental setting." This is true, currently, in a wider landscape context, but this needs to be related to and created at a neighbourhood level too. To enhance or create local environmental settings where nature and communities thrive together and environmental degradations are addressed such as air pollution, water pollution, traffic blight, lack of access to greenspaces, a built environment which designs out crime and enables a healthy lifestyle, etc. It has to

go beyond environmental 'setting' to acknowledge the dwindling biodiversity and environmental quality and the need for restoration and enhancements.

"This clear vision" - as outlined above it is not a clear vision, it is at best weak, the elements are contradictory and pursuing one will be at the expense of others.

"Exeter aims to be recognised as a leading sustainable city and global leader in addressing the social, economic and environmental challenges of climate change and urbanisation." This is a grand and laudable aim, but the focus is wrong. We don't need to prove this on a world stage, that's utterly irrelevant. Addressing the challenges has to be meaningful and relevant to the people who live here now, want to live here and future generations. We should be content to just be the best we can be.

"We are striving to make Exeter the most active and accessible city in England." There has been very little evidence of the transformative action to achieve this in terms of, for example, serious investment in walking and cycling and improvements for people who have disabilities and are less ambulant, and a transport strategy that does not include private traffic and air pollution reduction as an absolute goal.

In addition to the above the following is lacking:

- A recognition of Exeter's heritage and identity, important to so many people.
- The role of residents as active citizens - able to shape / have control over their area and assets and are enabled to have a meaningful input into planning processes. Genuine and accessible community participation and accountability throughout the planning process should be designed into the new plan. Each area should have a neighbourhood plan. (See below for Garden City principles)
- The importance of access to green and open spaces.

Question 4: Do you have any comments on the ideas which could shape the future pattern of development in Exeter?

The document sets out no clear strategy for the pattern of development. The future pattern of development should be focused on creating distinct '15 minute' neighbourhood based communities, with a local focus and identities. Communities should be connected and be able to travel easily within and out of the city, with active travel, public and shared transport, prioritised to enable and remove the dominance of the private car.

The plan should place greater emphasis on repurposing and refurbishment of existing stock (including retail, employment etc) as an alternative to demolition and rebuild. The whole-life carbon emissions from the latter will make it more difficult to reach the NZE 2030 target.

Avoid creating developments on really steep areas which make active travel difficult and consider drainage etc.

Exeter should meet as a minimum the Accessible Natural Greenspace Standard for England (Natural England, 2010a) guidelines for amount of greenspace per person/m2. The diagram (from Fields in Trust Website) shows areas in dark brown the wards that met the min requirements.

This needs to be accessible and meet the criteria.

<https://www.fieldsintrust.org/parkxtinction-outcome>



With regard to the specific points:

“Focus on the city centre, existing centres and previously developed land, including the regeneration of the Grecian Quarter (around Sidwell Street and the bus station) and the Water Lane area (around the canal in the Haven Banks area)”

Agree - it is already being brought forward under Liveable Exeter proposals. Redevelopment plans for the area must preserve and enhance the independent retail nature of the Sidwell Street area, e.g. keep rents low and develop the cultural aspects of the area. Redevelopment should conform with redevelopment hierarchy - refurbish first before rebuilding. Mixture of long term housing, not just student accommodation high transition. Developments must create new green space to relieve the burden on the Valley Park and not impinge on the Valley Park. These must be ultra low ar developments, prioritising walking cycling and people with disabilities. Sites should be self-sufficient with energy generation and SUDS. The “Western Way, the Inner Bypass and Exe Bridges were primarily designed for traffic to access and bypass the city centre and in doing so create a perceived barrier with the adjacent residential neighbourhoods”,¹ this still stands and the new local plan must reduce the impact of this road on the neighbourhoods and city and provide proper provision for walking and cycling.

“Provide for additional development in sustainable urban extensions on the edges of the city” Disagree - the Liveable Exeter proposals negates the need for extensions on the edges.

“Steer development away from the hills to the north and north west - the important landscape areas for the city” This is weak - needs to be a strong statement of protections for the landscape setting of the city to protect the remaining ridgelines and develop a ridgeline protected park joining the western hills to the Clyst Vale and linking down into the Valley Parks. The plan must recognise and conserve the heritage of designated landscapes, which must be safeguarded against inappropriate development. Their enhancement must be prioritised, underpinned by robust data collection, appropriate resourcing and strong community participation. Steering development away from sensitive environmental areas such as the Exe Estuary and hills to the north and north west of the city, ignores other important conservation corridors.

“Redevelopment of brownfield land in the city” As a general principle this is good, however this must not include ‘brownfield’ land that has since become public open space, green space or parks. Car parks should be considered brownfield sites and they are an inefficient and carbon intensive use of land.

¹ [Exeter City Centre Vision Document.pdf](#)

The Garden City Principles, reinterpreted by the T&CPA should be adopted as the basis of the future patterns and quality of development:

“The Garden City Principles are an indivisible and interlocking framework for their delivery, and include:

- Land value capture for the benefit of the community.
- Strong vision, leadership and community engagement.
- Community ownership of land and long-term stewardship of assets.
- Mixed-tenure homes and housing types that are genuinely affordable.
- A wide range of local jobs in the Garden City within easy commuting distance of homes.
- Beautifully and imaginatively designed homes with gardens* , combining the best of town and country to create healthy communities, and including opportunities to grow food.
- Development that enhances the natural environment, providing a comprehensive green infrastructure network and net biodiversity gains, and that uses zero-carbon and energy-positive technology to ensure climate resilience.
- Strong cultural, recreational and shopping facilities in walkable, vibrant, sociable neighbourhoods.
- Integrated and accessible transport systems, with walking, cycling and public transport designed to be the most attractive forms of local transport.”

*[or access to shared gardens or green spaces - our suggestion].

[Garden City Principles | Town and Country Planning Association \(tcpa.org.uk\)](https://www.tcpa.org.uk)

The documents refer to garden city - but there is no evidence whether in the vision of the associated text of a commitment to take such principles forward, especially in regard to community involvement.

High density development in the city centre and close by is acceptable. High density need not be tall buildings. Well designed higher density, but lower rise (to protect landscape setting) housing on windfall sites and the edge of the city could also be considered.

“Locating development to maximise walking and cycling and to make use of public transport” It should go further: “Providing the infrastructure to prioritise walking, cycling and other active travel - and make it safe, convenient, comfortable, affordable and fun for people of all ages and abilities in new and existing developments. Transform the transport system to meet the requirements of the sustainable transport hierarchy and reduce traffic in and through the city.”

Question 5: Do you have any comments on the ideas which could shape the future quality of development in Exeter?

The ‘Garden City principles’ identified in the document are considerably watered down compared to those offered by the T&CPA (see above) and provide a much clearer set of principles to work to. The proposed principles remove all community interests and involvement and are so generalised and ‘flexible’ that they offer no strong guidance on planning principles.

Re “Enhance the natural and historic environment” - is crucial, but weak.

- Exeter’s long and unique heritage should be put on an equal footing with the priority for new development. New developments should not be detrimental or a pastiche, but respect and enhance; and where necessary improve the heritage in appropriate ways.
- A new proactive and innovative approach is needed to maintain and improve historic buildings and those in conservation areas, for example to enable buildings to be adapted to improve energy efficiency and reduce carbon emissions.
- The City Wall and heritage harbour need to be respected and enhanced - and enable the harbour to be a working port, a leisure facility and a place for wildlife, not just a redevelopment opportunity. The relevant SPD needs to be updated, taking on board the work of the Friends of the Exeter Ship Canal in particular.
- Development along the River and canal and canal basin should not be a blight, e.g. so close to the canal/basin that it overshadows the water and reduces natural light or causes additional pollution.
- **The River Exe** is neglected and polluted and the new Plan must enable improvements to the river and enable the river to connect better to its local environment rather than it being treated as a barrier to get over. Opportunities for community owned electricity generation and leisure should be permitted, in ways that do not impact negatively on wildlife.
- **Support healthy lifestyles** [see transport/air pollution] This is very weak. Health, wellbeing and equality must be embedded into the new local plan including priorities for access to natural green space, active travel and reducing air pollution. The long standing and widening inequalities (as shown in the indices of multiple deprivation) in Exeter should be recognised and addressed in order to reduce the number of people living in areas of multiple deprivation.

In addition:

- The plan should actively enable neighbourhood retrofit to improve energy performance, increase green spaces and biodiversity and sustainable travel.
- District heating should only be provided as a retrofit solution or to heat water if it can’t be provided by onsite technology or a genuine fabric first approach. NOTE: A district heating system to the incinerator is not a low carbon solution as it is the largest single emitter of CO2 in the city. This policy should be replaced with one that provides district heating from renewable sources, if at all.
- All new developments must be net zero or carbon negative - this must be taken for the development of the site as a whole and include energy generation.
- Community Infrastructure levy must be used as a lever to incentivise low carbon developments. All new developments must pay CIL, including the Liveable Exeter developments, which are to be heavily subsidised by public funding. This could include a retrofit levy to help fund existing housing to improve energy efficiency.
- Recognise that the need for higher density housing means that garden space will be communal rather than individual: this makes quality and beauty even more important.
- An increase in allotments and food production areas in community or public spaces should be provided for.

- There should be no new advertising space and planning must work with other licensing to control advertising - in particular stop advertising of high carbon products and reduce visual clutter, including no lit advertising boards.
- Light pollution - must be sufficient to enable community safety and be designed to minimise impact on biodiversity, and be excluded at night.
- Commitment to WHO air pollution standards - need to aim for 10 mg/2 NO. AQ contributions 1 in 20 in Exeter lives shortened by air pollution. Measures to design out air pollution must be included in the design codes. Public Health England's Public Health Outcomes Framework tool shows that in Exeter in 2017 the fraction of mortality attributable to particulate air pollution was 4.4%². The Local Plan, major developments and every application should consider site specific and cumulative air pollution and reduction to meet the WHO targetes.

Question 6: Are there any further comments you would like to make on the new Exeter Local Plan?

- Deliver an evidenced strategy to build genuinely affordable homes, penalise lack of build-out, and provide local authorities with the clear policies to be able to turn down developments which do not deliver affordable housing.
- An additional fee should be charged for the processing of removals of trees in border to set up a tree fund for the planting and maintenance of replacement trees.
- Developer contributions: see notes above relating to integrating Multi Purpose shared housing in the S106 affordable housing regime and also the need for review mechanisms for viability as now adopted by the 2021 London Plan.
- The feedback on the submitted issues from this consultation should be published and further investigation and consultation undertaken before the first draft is published.

Exeter Green Party
15th November 2021

² http://committees.exeter.gov.uk/documents/s80658/ASR_Template_England_2021_v2.0.pdf